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15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 KENEDI WESTON, an individual,
 18 Plaintiff,
 19 v.
 20 LEGALZOOM.COM, INC., a Delaware
 21 corporation,
 22 Defendant.

Case No.: 2:25-cv-00196-RFB-DJA

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

As amended on page 3

23 Pursuant to Federal Rule of Civil Procedure 26(f), Plaintiff Kenedi Weston ("Plaintiff"), by
 24 and through her counsel of record, Greenberg Gross LLP, and Defendant LegalZoom.com, Inc.
 25 ("Defendant"), by and through its counsel of record, Ogletree Deakins, hereby stipulate to the
 following Joint Proposed Discovery Plan and Scheduling Order based on Defendant's Answer filed
 on April 18, 2025.

26 1. **Initial Disclosures:** The parties participated in the scheduling conference pursuant
 27 to Fed. R. Civ. P. 26(f) on **April 29, 2025**. The parties shall exchange initial disclosures pursuant to
 28 Fed. R. Civ. P. 26(a)(1) no later than fourteen (14) days after the Rule 26(f) conference, which will

1 be **May 13, 2025**. Aside from timing, the parties do not believe that any changes are necessary as
 2 to the form or requirement of disclosures under Fed. R. Civ. P. 26(a)(1).

3 2. **Discovery Cut-Off Date(s):** The last day of discovery shall be **October 15, 2025**,
 4 which is 180 days from the date Defendant filed its Answer to Plaintiff's Complaint, of **April 18,**
 5 **2025.**

6 3. **Amending the Pleadings and Adding Parties:** The parties shall have until **July 17,**
 7 **2025**, which is ninety (90) days before the discovery cut-off date, to file any motions to amend the
 8 pleadings or to add parties.

9 4. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** The disclosure of any initial expert
 10 witnesses shall be made by **August 18, 2025**, which is sixty-two (62) days before the discovery
 11 deadline (as the sixtieth day (60) lands on a non-judicial date Saturday, August 16, 2025). The
 12 disclosures of any rebuttal experts shall be made by **September 15, 2025**, which is thirty (30) days
 13 before the discovery deadline.

14 5. **Dispositive Motions:** Dispositive motions may be filed no later than **November 14,**
 15 **2025**, which is thirty (30) days after the discovery deadline. In the event that the discovery period is
 16 extended from the discovery cut-off date set forth in this Joint Discovery Plan and Scheduling Order,
 17 the date for filing dispositive motions shall be extended for the same duration, to be no later than
 18 thirty (30) days after the extended discovery deadline.

19 6. **Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be
 20 filed by **December 15, 2025**, which is thirty-one (31) days after the deadline for filing dispositive
 21 motions (as the thirtieth day (30) lands on a non-judicial date Sunday, December 14, 2025). In the
 22 event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until
 23 thirty (30) days after the decision of the dispositive motions or until further order of the Court.

24 7. **Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
 25 26(a)(3), and any objections thereto, shall be included in the pretrial order. Extensions or
 26 Modifications of the Discovery Plan and Scheduling Order: In accordance with Local Rule 26-4, a
 27 stipulation or motion for modification or extension of this discovery plan and scheduling order and
 28 any deadline contained herein, must be made not later than twenty-one (21) days before the subject

1 deadline.

2 8. **Electronic Filing and Service:** The Parties attorneys of record in this matter are
 3 registered users with the Court's electronic filing system and as such, consent to electronic service
 4 of all documents and things electronically filed with the Court, except for pleadings and other
 5 documents set forth in Fed. R. Civ. P. 4. For documents and things that are not filed with the Court,
 6 the parties, in accordance with Fed. R. Civ. P. 5(b)(2)(F), each consent to electronic service of the
 7 same as follows: for Plaintiff, service shall be made by email to JDunn@GGTrialLaw.com,
 8 MHale@GGTrialLaw.com, and MBurnette@GGTrialLaw.com; and for Defendant, service shall be
 9 made by email to suzanne.martin@ogletree.com and noel.hernandez@ogletree.com.

10 9. **Discovery Disputes:** The parties agree that before moving for an order relating to
 11 discovery after complying with the Federal Rules of Civil Procedure and applicable Local Rules of
 12 this District, the moving party must request a status conference with the Court pursuant to Fed. R.
 13 Civ. P. 16(b)(3)(B)(v) and LR 26-1(c).

14 10. **Electronically Stored Information:** The parties do not at this time anticipate any
 15 issues regarding disclosures, discovery or preservation of electronically stored information ("ESI"),
 16 if any, including the form or forms in which it should be produced. The parties anticipate that
 17 evidence will be presented to jurors at trial in electronic format. As such, the parties will endeavor
 18 to produce all documents in a format compatible with the Court's electronic jury evidence display
 19 system. The parties agree that ESI can be produced or presented at trial in a readable image (e.g.,
 20 .pdf or .tiff) file, while reserving the right to thereafter seek production of the ESI in native format
 21 if necessary and to the extent readable images are insufficient in establishing any claims or defenses.
 22 If a party later requests the ESI be produced in its native format and/or as a forensic copy, the parties
 23 agree to meet and confer to determine the parameters of the production and to produce according to
 24 the Federal Rules of Civil Procedure. The parties shall work in good faith with respect to the
 25 production and presentation of ESI at trial.

26 11. **Privileged or Protected Documents:** The parties agree to be bound by Fed. R.
 27 Evid. 502 regarding the disclosure of privileged material or work product. Further, the parties
 28 acknowledge and agree that while each is taking reasonable steps to identify and prevent disclosure

1 of any document which they believe is privileged, there is a possibility that certain privileged
2 material may be produced inadvertently. Accordingly, the Parties agree that a party who produces a
3 document protected from disclosure by the attorney-client privilege, attorney work product doctrine
4 or any other recognized privilege ("privileged document") without intending to waive the claim of
5 privilege associated with such document may promptly notify the requesting party that such
6 document was inadvertently produced and should have been withheld. Once the producing party
7 provides such notice to the requesting party, the requesting party must promptly return the specified
8 document(s) and any copies thereof. By complying with this obligation, the requesting party does
9 not waive any right to challenge the assertion of privilege.

10 12. **Alternative Dispute Resolution:** In compliance with Local Rule 26-1(b)(7), the
11 parties certify that they met and conferred about the possibility of using alternative dispute
12 resolution processes, but no agreement has been reached. The parties will continue to evaluate
13 opportunities for alternative dispute resolution.

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13. **Alternative Forms of Case Disposition:** In compliance with 28 U.S.C. § 636(c)
2 and Local Rule 26-1(b)(8), the parties have considered consenting to trial before the assigned
3 Magistrate Judge well as the Short Trial Program, but do not consent to trial by the magistrate judge
4 or to the use of the Short Trial Program at this time.

Dated this 5th day of May, 2025.

6 /s/ Michael A. Burnette
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Attorneys for Defendant

ORDER

IT IS SO ORDERED:

John

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: May 6, 2025